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**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In the Matter of: : Case No.: 21-11993
: Chapter 13
RAFAEL ROSARIO-PAULINO :
: :
: :
Debtor. : **CERTIFICATION OF DEBTOR**
: **IN SUPPORT OF CONFIRMATION**
: :
: :

I, Rafael Rosario-Paulino, upon my oath according to law, hereby certify as follows:

1. I am the Debtor in the above captioned matter and am fully familiar with the facts of this matter. I submit this Certification in Support of Confirmation.
2. On March 12, 2021, the Debtor filed a Voluntary Chapter 13 Bankruptcy Petition under the United States Bankruptcy Code.
3. The Debtor filed this bankruptcy case in an attempt to save his home.
4. The Debtor filed the Chapter 13 Plan on March 24, 2021 to obtain loss mitigation with PNC Bank (1st mortgage) through the bankruptcy case.
5. On March 30, 2021 a Notice of Request for Loss Mitigation with PNC Bank (1st mortgage) was entered.
6. On April 14, 2021, an Order Granting Notice of Request for Loss mitigation was entered.

7. On June 30, 2021, an Order confirming the Chapter 13 Plan was entered allowing Debtor until June 30, 2021 to obtain a loan modification. The plan was confirmed at \$200.00 per month.

8. Debtor was then denied loss mitigation.

9. On September 22, 2021, the Trustee filed a Motion to Dismiss Case due to failure to obtain loan modification by June 30, 2021.

10. Debtor filed a Modified Chapter 13 Plan on October 11, 2021 to extend the loan modification period with PNC Bank (1st mortgage) outside the bankruptcy case.

11. The Debtor has submitted all documents for the loan modification.

12. Creditor, PNC Bank, (1st mortgage) attorney did not object to the Modified Chapter 13 Plan.

13. The Modified Chapter 13 Plan proposed a plan payment of \$200.00 which is the confirmed Chapter 13 Plan amount.

14. There was no change to Schedules I and J of the Debtor when we filed the Modified Chapter 13 Plan so now there should be a small increase in the trustee payment to cover the arrears of the second mortgage.

15. Debtor hereby requests the Chapter 13 Trustee reserve making payments to secured creditor, PNC Bank (1st mortgage) pending the loan modification.

16. Debtor will make all necessary post adequate protection payments to the secured creditor, PNC Bank (1st mortgage) pending the loan modification.

17. In the event Debtor is denied a loan modification, Debtor will amend the Chapter 13 Plan to cure the arrears.

18. On October 20, 2021, Creditor, PNC Bank (2nd mortgage) filed an Objection to Confirmation of Amended Chapter 13 Plan.

19. Secured Creditor's attorney and Debtor entered into a Consent Order resolving the objection by allowing Debtor to cure the arrears in the amount of \$1,086.78 through the Amended Chapter 13 Plan.

20. Debtor requests the Chapter 13 Trustee incorporate the arrears into the proposed payment on the Modified Chapter 13 Plan.

21. Debtor will make all necessary post-petition payments to PNC Bank (2nd mortgage) pursuant to agreed terms of the Consent Order upon entry on the docket.

22. Debtor will continue to make all Chapter 13 Trustee payments pursuant to the Amended Chapter 13 Plan.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 17, 2021

/s/ RAFAEL ROSARIO-PAULINO
RAFAEL ROSARIO-PAULINO